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ABSTRACT

Federal requests to collect data from local school systems originate at the federal program level; and through a series of processes, are placed before the Council of Chief State School Officers' (CCSSO) Committee on Evaluation and Information Systems (CEIS) for review. The New Jersey CEIS Coordinator is located within the Office of Management Information, allowing that office to have prior knowledge of all proposed federal data collections and allowing a rational approach to each. After consulting with local education agency personnel and the Office of Management Information, the Commissioner of Education may inform the Office of Management Information that the Department will not participate in the study, that it will participate in the study, or that no decision has been made. In the last case, the Office of Management Information should survey the Department to see if a program cost center will sponsor the study. If not, the Department must acknowledge the federal government with a no participation statement. If the Department does participate in the data collection, the Internal Data Collection Advisory Committee and the Local Education Agency (LEA) Data Collection Advisory Committee must approve the data collection instrument. (BW)

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STANDARD OPERATING PROCEDURES FOR COLLECTING DATA REQUESTED BY THE FEDERAL GOVERNMENT

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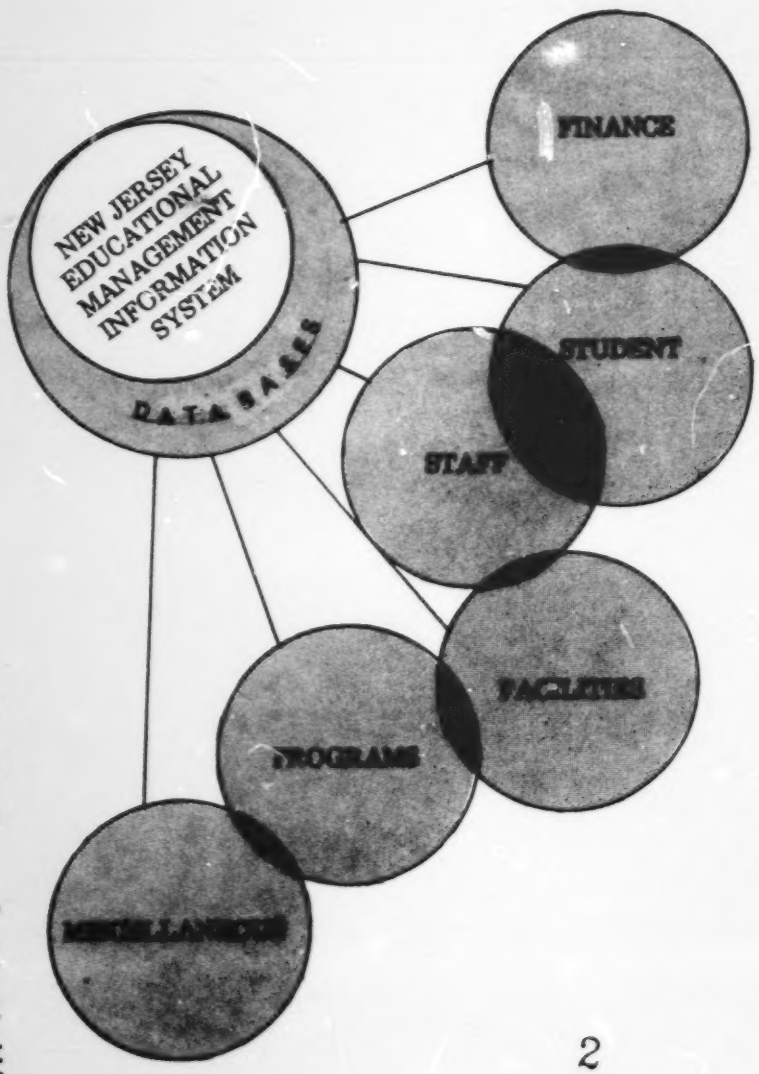

OFFICE OF
MANAGEMENT INFORMATION

Fred G. Burke, Commissioner
New Jersey Department of Education

August, 1977

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NEW JERSEY DEPARTMENT OF EDUCATION

Fred G. Burke, *Commissioner*
Ralph H. Lataille, *Deputy Commissioner*

STANDARD OPERATING PROCEDURES FOR COLLECTING DATA REQUESTED BY THE FEDERAL GOVERNMENT

NOTE:

This paper describes in detail *DATA COLLECTION POLICY STATEMENT NO. 3* as extracted from the department's *"Standard Operating Procedures for Collecting Data from Local Education Agencies"*, April 1976, That is:

> No federal agency or its contractor shall collect data directly from Local School Systems. All such requests for data must be routed through the Office of Management Information and then assigned to an appropriate program cost center.

THIS PROCESS MUST BE UTILIZED WHEN COLLECTING DATA FROM LOCAL SCHOOL SYSTEMS.

Vincent Calabrese
Assistant Commissioner
Administration and Finance

Edward M. Jackowski, Ph.D.
Director
Office of Management Information

Francis Pinkowski
MIS Project Director
Office of Management Information

AUGUST 1977

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STANDARD OPERATING PROCEDURES
FOR COLLECTING DATA REQUESTED
BY
THE FEDERAL GOVERNMENT

Input as to whether or not a federal request to collect data has substance behind it, whether or not the data collection should increase/decrease its sample size *(if it is a sample)*, whether or not all data elements are *NECESSARY vs. NICE TO KNOW INFORMATION*, are reviewed through a two step process. The first review process occurs *prior* to the data collection instrument's receipt by the Department of Education; and, the second review occurs *before* the data collection instrument is submitted to a local school system for completion. A simplistic diagram describing the process is shown in Figure 1.

Prior to Department of Education Receipt

Federal requests to collect data from local school systems originate at the federal program level; and, through a series of processes are placed before the Council of Chief State School Officers' *(CCSSO)* Committee on Evaluation and Information Systems *(CEIS)*. "The *CCSSO* policy on federal data acquisition supports the concept that all *(federal)* data collection activities should be coordinated through the National Center for Education Statistics *(NCES)*"[1] with *CEIS* involvement.

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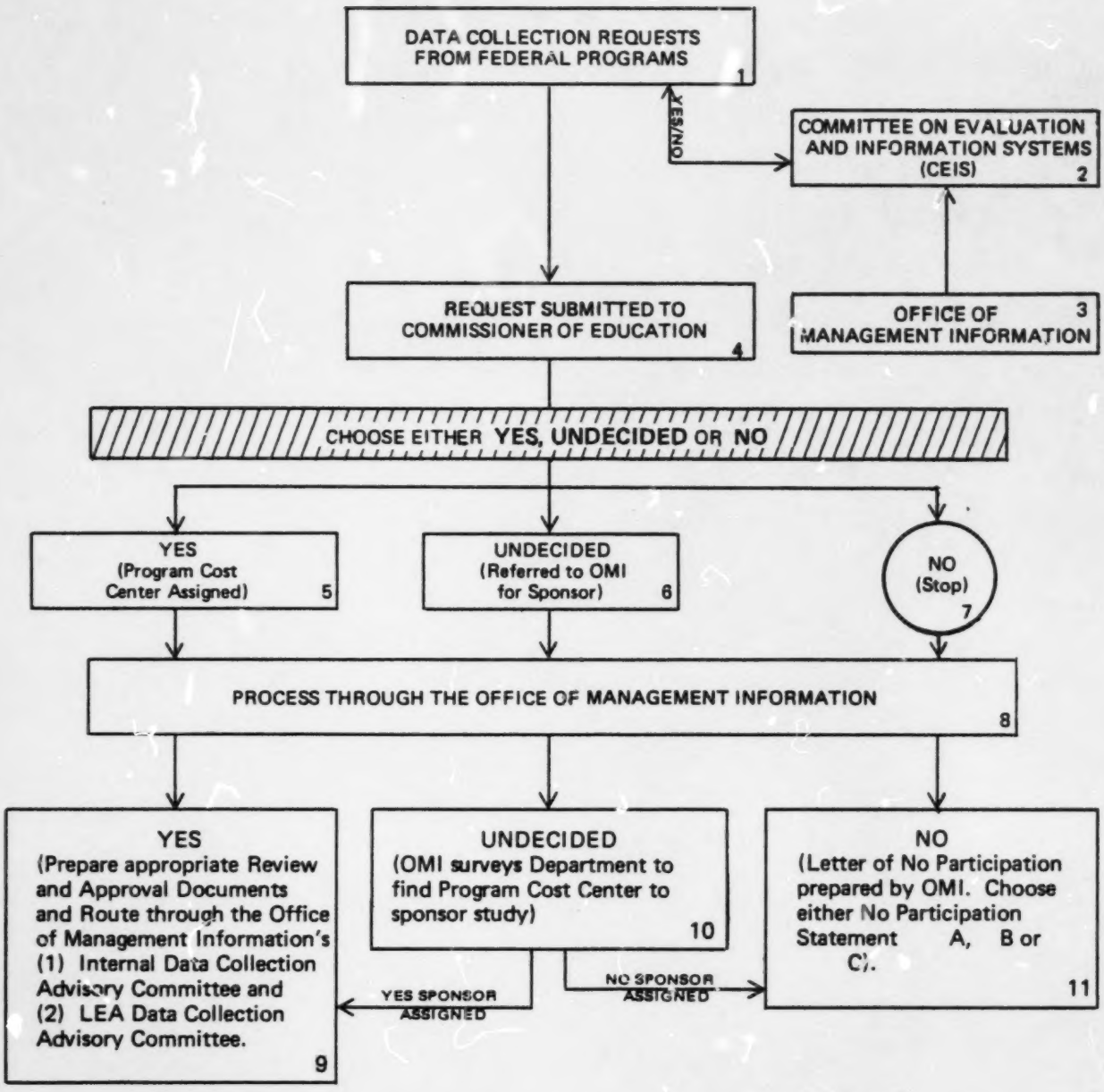
[1] *NCES* has the major responsibility for coordinating through an Educational Data Acquisition Council *(EDAC)* all requests to collect educational statistics.

FIGURE I

DATA COLLECTION MODEL
FOR COLLECTING DATA REQUESTED
BY
THE FEDERAL GOVERNMENT


DATA COLLECTION REQUESTS FROM FEDERAL PROGRAMS 1
YES/NO
COMMITTEE ON EVALUATION AND INFORMATION SYSTEMS (CEIS) 2
REQUEST SUBMITTED TO COMMISSIONER OF EDUCATION 4
OFFICE OF MANAGEMENT INFORMATION 3
CHOOSE EITHER YES, UNDECIDED OR NO
YES (Program Cost Center Assigned) 5
UNDECIDED (Referred to OMI for Sponsor) 6
NO (Stop) 7
PROCESS THROUGH THE OFFICE OF MANAGEMENT INFORMATION 8
YES (Prepare appropriate Review and Approval Documents and Route through the Office of Management Information's (1) Internal Data Collection Advisory Committee and (2) LEA Data Collection Advisory Committee. 9
UNDECIDED (OMI surveys Department to find Program Cost Center to sponsor study) 10
YES SPONSOR ASSIGNED
NO SPONSOR ASSIGNED
NO (Letter of No Participation prepared by OMI. Choose either No Participation Statement A, B or C). 11

This figure describes the flow of activities required to approve a federal data collection before it is submitted to New Jersey's local education agencies for completion.

CEIS, a representative body of State Department of Education personnel, is working with federal agencies in an effort to reduce the enormous amounts of paperwork that the federal government requires, i.e., not essential paperwork but paperwork that does not have a sound purpose behind it, that does not have a utilization factor, that does not eliminate nice to know information, and finally that does not reflect or take into consideration that which has been collected. To make the process thoroughly efficient, each state has a voting member on *CEIS*--the *CEIS* Coordinator. Participation on *CEIS* is open to all state and local district personnel that want to review and have a bearing upon federal data collections prior to the actual data collection.

The New Jersey *CEIS* Coordinator is located within the Office of Management Information and should adhere to standard *CEIS* recommendations as described in the *CEIS* procedures and guidelines manual. Excerpts from the manual are:

> *CEIS* recommendations for or against federal data acquisition should be documented and disseminated in a timely and appropriate manner by the *CEIS* Chairman/or appropriate *CCSSO* official. After *CEIS* recommendations and *CCSSO* approvals have been received at the state level, each *CEIS* State Coordinator may wish to advise his chief state school officer of these actions and recommend to him that he actively support the recommendations of *CCSSO* with his staff or local school districts.
>
> Conversely, if a federal data acquisition has not been coordinated through the *CEIS/CCSSO* process, the *CEIS* State Coordinators may wish to draft a letter to the federal program officer in charge of the uncoordinated data acquisition advising him that without *CEIS* recommendation and *CCSSO* approval, the chief state school officer cannot ask local school districts or staff members to complete the reports. The letter would be signed by the chief state school officer or his representative with a copy to each of the appropriate local school systems.

Therefore, prior to the New Jersey Department of Education's receipt of a federal data collection, the Office of Management Information will have had knowledge of all proposed federal collections. This type of prior knowledge will allow a rational judgment to be made by the Office of Management Information in reporting a suggested approach for each federal data collection.

Before LEA Submission

After a federal request to collect data from local school systems has been reviewed at the federal level by *CEIS* and the Department's Office of Management Information, it must then be reviewed by departmental and local education agency personnel before it becomes an official Department of Education data collection. The activities that transpire *(First)* between the federal government and the Department of Education and *(Second)* within the Department of Education are:

FIRST. (Activities between the federal government and the Department of Education)

The Commissioner of Education is contacted through a letter announcing the award of a federal contract to conduct a data collection. The letter contains a general description of the study to be conducted and a request for the Commissioner's cooperation and support. A second letter is usually then received from the study contractor which provides information on the number of districts in the sample, the data collection instrument, and a request to contact

the local chief school administrators either directly or indirectly through the Department of Education.

After the Commissioner is initially contacted and in receipt of the required information pertaining to the study, he/she then informs the Office of Management Information of the request to collect data. By this time, the Office of Management Information should be fully cognizant of the study because of their involvement with *CEIS* prior to the Commissioner's receipt of the proposed data collection.

At this point, the Commissioner has three alternatives to choose from: (1) to inform the Office of Management Information that the Department of Education will not participate in the study *(NO)*; (2) to inform the Office of Management Information that the Department of Education will participate *(YES)*, in this case, the Commissioner will assign a specific program cost center the responsibility for the data collection and the Office of Management Information will then inform that program cost center through their appropriate Division Head; or (3) to inform the Office of Management Information that no decision has been made *(UNDECIDED)*.

In the case of decision #3, the Office of Management Information should survey the

Department of Education to see if a program cost center will sponsor the study. If no sponsor is found, the Department of Education must acknowledge the federal government with a *no participation* statement. The *no participation* statement can follow one of three possible formats. These are:

A. The New Jersey Department of Education acknowledges the need for the survey; however, due to the enormous response burden that our local school systems have been witnessing over the past several years, it would be unfair for the Department to approve this survey as an official New Jersey Department of Education data collection,

B. the New Jersey Department of Education acknowledges the need for the survey; however, due to the nature of the survey and the duplicate data that it collects, it would be unfair to our local school systems (who have been witnessing an inordinate amount of paperwork over the past several years) if the New Jersey Department of Education were to approve this data collection, or

C. the New Jersey Department of Education acknowledges the need for the survey

> and because the Council of Chief State School Officers' *(CCSSO)* Committee on Evaluation and Information Systems *(CEIS)* has approved the data collection our Office of Management Information finds it acceptable for distribution to our local school systems. However, at this time, the New Jersey Department of Education cannot make this an official data collection and we can assume, in this instance, you will contact our districts directly without our participation. Specifically, you or your contractor may inform New Jersey's local school systems that the survey does have *CEIS* clearance and that our Office of Management Information finds it acceptable. This is a voluntary survey.

No participation statement #A signifies that *CEIS* does not recommend the data collection because it places an undue burden upon our local school systems, or the Office of Management Information believes the methodology behind the survey is unsound. Statement #B signifies that a major portion of the survey information has been collected by the federal government in a previous

survey or is anticipated to be collected in a future survey. The information requested on the survey is duplicative in nature. On the other hand, statement #C signifies that *CEIS* has approved the study and the Office of Management Information is in concurrence, this statement is self-explanatory. An example of a no participation statement is shown in Exhibit 1. *MIS* numbers will not be assigned in any of these three situations.

SECOND. (Activities within the Department of Education)

If the Commissioner of Education decides *(YES)* to participate in a study or is *(UNDECIDED)* and the Office of Management Information finds, through a Division Data Analyst, a program cost center that will sponsor the study, then the study must be reviewed by the Office of Management Information's data collection advisory committees before an authorized *MIS#* can be assigned.

The advisory committees that must review the data collection instrument are:

1. The Internal Data Collection Advisory Committee which is composed of Deputy Assistant Commissioners or their equivalent, and

2. The *LEA* Data Collection Advisory Committee which is composed of local school board members, chief school administrators, business managers, elementary and secondary principals, federal coordinators, and teachers.

If for any reason either of these advisory committees disapprove an instrument, then the appeal procedure as expounded in the Department's Standard Operating Procedure for Collecting Data from Local Education Agencies, April 1976 will be implemented.

EXHIBIT I

STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
225 WEST STATE STREET
TRENTON, N. J.

OFFICE OF THE COMMISSIONER

May 17, 1977

Mr. Sherman Landau
Chief
Governments Division
Bureau of the Census
United States Department of Commerce
Washington, D. C. 20233

Dear Mr. Landau:

The New Jersey Department of Education is currently in the process of developing a stringent forms control and evaluation procedure. As part of the process, our Office of Management Information has reviewed the data you are seeking with other departmental personnel and cannot find an intermediate data collector for your Bureau. Therefore, Option B cannot be considered, nor can Option A, because we do not collect such specific information.

Our "Standard Operating Procedures for Collecting Data Requested by the Federal Government" read as follows:

> "If no sponsor is found, the Department of Education must acknowledge the federal government with a no participation statement. The no participation statement can follow one of three possible formats. These are:
>
> 1. The New Jersey Department of Education acknowledges the need for the survey; however, due to the enormous response burden that our local school systems have been witnessing over the past several years, it would be unfair for the Department to approve this survey as an official New Jersey Department of Education data collection,

2. The New Jersey Department of Education acknowledges the need for the survey; however, due to the nature of the survey and the duplicate data that it collects, it would be unfair to our local school systems (who have been witnessing an inordinate amount of paperwork over the past several years) if the New Jersey Department of Education were to approve this data collection, or

3. The New Jersey Department of Education acknowledges the need for the survey and because the Council of Chief State School Officers' (CCSSO) Committee on Evaluation and Information Systems (CEIS) has approved the data collection our Office of Management Information finds it acceptable for distribution to our local school systems. However, at this time, the New Jersey Department of Education cannot make this an official data collection and we can assume, in this instance, you will contact our districts directly without our participation. Specifically, you or your contractor may inform New Jersey's local school systems that the survey does have CEIS clearance and that our Office of Management Information finds it acceptable. This is a voluntary survey."

Based upon the above three statements, it is our opinion that format #3 applies to your Form E-6, 1977 Census of Governments, Survey of Government Employment, School System. Our option in this case is Option C.

If we can be of further assistance in making your data collection efforts easier to manage, please do not hesitate to call or write Dr. Edward M. Jackowski, Director of the Office of Management Information, Area Code 609, 292-8405.

Sincerely,

Dr. Fred G. Burke
Commissioner of Education

FGB:EMJ:ls

cc: Mr. Vincent B. Calabrese
Dr. Ralph H. Lataille
Dr. Edward M. Jackowski